

I would like to comment against the petition for rule making that would create subbands on the 160 meter amateur band. This proposal would create additional government regulation for a band which does not need it, and would increase the FCC's cost of governing and enforcing such action. There is no problem on the 160 meter band as

it presently exists, and the proposal appears to be coming from a specific user group, which would be self-serving and inadmissable as a reason to make a rule change. Better methods of assuring that specific modes are in designated subbands can be accomplished through

user associations, such as ARRL suggestions or gentlemen's agreements.

This proposal should not be permitted to become a NPRM as it does not serve the majority of users of this band but would overly

restrict operation for most. There are enough other HF bands with specific subbands that various operational modes can be isolated and operate in with exclusivity. I request that 160 meters not be added as yet another band with exclusive subbands for a few modes.